

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI**

BARBARA JOHNSON, *et al.*

Plaintiffs,

v.

No. 4:24-cv-00174-BP

GOVERNOR MICHAEL L. PARSON., *et al.*,

Defendants.

**STATE DEFENDANTS' MOTION FOR EXTENSION OF TIME**

Defendants Governor Michael L. Parson; Attorney General Andrew Bailey; and Secretary of State Jay Ashcroft respectfully request an extension of time, up to and including July 15, 2024, to file their suggestions opposing Plaintiffs' Motion for Leave to File their Second Amended Complaint. In support, Defendants state as follows:

1. On June 20, Plaintiffs moved this Court for leave to file a second amended complaint, which has more than 100 more paragraphs than their first amended complaint. (Docs. 28–29).

2. In their proposed second amended complaint, (Doc. 28-1), Plaintiffs seek: [1] to sue all defendants in their official and individual capacities, *id.* ¶¶ 21–26; [2] to sue an additional defendant, *id.* ¶ 26; [3] to argue that Missouri's police laws have been procedurally defunct and “null and void” since 1939, *id.* ¶¶ 45–68, 135–138, 142–143, 156–160, 163–64; and [4] to add 6 new counts, including a Racketeer Influenced and Corrupt Organizations Act (RICO) claim. *Id.* ¶¶ 200–209.

3. The defendants have until June 8 to file their suggestions opposing Plaintiffs' motion for leave. (Docket Entry 28).

4. State Defendants believe this Court should deny Plaintiffs' motion but undersigned counsel currently has a heavy press of business that makes completing an opposition before July 8 unduly difficult.

5. Missouri's state offices will be closed on July 4.

6. State offices of Missouri's executive branch will be closed also on July 5, per an executive order issued yesterday. Mo. Executive Order 24-09.<sup>1</sup>

7. Undersigned counsel asked the parties' respective counsel their positions on this motion: Plaintiffs consent; but the undersigned has not yet received a response from the Board's counsel by the time this motion was filed.

For the forgoing reasons, Defendants Govern Parson; Attorney General Bailey; and Secretary of State Ashcroft request an extension of time up to and including July 15, 2024 in which to file their suggestions opposing Plaintiffs' motion for leave to file their proposed second amended complaint.

Dated: July 2, 2024

Respectfully submitted,

**ANDREW BAILEY**  
Attorney General

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<sup>1</sup> <https://www.sos.mo.gov/CMSImages/Library/Reference/Orders/2024/24-09.pdf>.

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*Counsel for State Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 2, 2024, the foregoing was filed electronically through the Court's electronic filing system to be served electronically on all counsel of record.

/s/ Caleb Rutledge